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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY PRODUCTS
LIABILITY LITIGATION

This Document Relates To:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

**JOINT STATUS REPORT ON
DISCOVERY FOR MARCH 20, 2025
DISCOVERY MANAGEMENT
CONFERENCE**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Discovery Management Order (“DMO”) No. 2 (ECF 606), the Personal Injury (“PI”) and School District and Local Government Entity (“SD”) Plaintiffs, State Attorneys General (“State AGs”), and Defendants submit this agenda and joint statement in advance of the March 20, 2025, Discovery Management Conference (“DMC”).

I. Undisputed Administrative Issues the Parties Would Like to Bring to the Court’s Attention Which Do Not Require Court Action

A. Meta v. State AGs

1. Update on State Agency Agreements and Productions Following District Court’s March 6 & 10 Orders

In orders issued on March 6 and 10, 2025, the District Court denied the States’ motion for relief from this Court’s September 6, 2024 agency discovery order (ECF 1117) as to 22 States, but granted relief as to 8 States: Delaware, Kansas, Louisiana, Missouri, Nebraska, Rhode Island, South Carolina, and Wisconsin. *See* ECF 1741 and 1754. Of these 8 States:

- **Missouri** has agreed in principle to dismiss its case subject to the Parties’ memorializing their agreement in writing, as previously reported to the Court. *See, e.g.*, ECF 1430-15, 1482 at 26.
- **Kansas**: An update will be provided at the DMC.
- **South Carolina**: Agrees to complete the State’s production of state agency documents for the discovery already served under the following conditions. First, that Meta submits to South Carolina in writing that by the South Carolina Attorney General’s Office proceeding forward in the production of state agency documents, it was not a waiver of any argument made by South Carolina as it relates to custody, possession, or control of state agency documents. The South Carolina Attorney General’s Office states that it is not acting as counsel for these agencies. Second, that all the state agencies consented to the South Carolina Attorney General’s Office proceeding with the production of their documents. Finally, an agreement from Meta that South Carolina has already satisfied substantial completion deadlines in its production of documents, but that additional state agency documents would be produced no later than March 28, 2025, and privilege logs produced no later than April 18, 2025. Meta is currently in negotiations with South Carolina with respect to these

conditions and expects to reach resolution without requiring the Court's intervention.

- **Nebraska** has told Meta that, within the limited scope of its representation of specified state agencies for purposes of document discovery and production and without waiving its objections, it will abide by its existing state agency document discovery agreements with Meta, and will complete its production of state agency documents by the deadlines set forth in the stipulated schedule that this Court so-ordered (ECF 1696).
- **Wisconsin** has told Meta that, without waiving its objections, it will abide by its existing state agency document discovery agreement with Meta, and will complete its production of state agency documents by the deadlines set forth in the stipulated schedule that this Court so-ordered (ECF 1696).
- **Rhode Island** has entered into negotiations with Meta to narrow its claims assuming the parties can reach a mutually agreeable stipulation regarding ongoing discovery obligations.
- The **Louisiana** Attorney General's Office will produce to Meta the responsive agency documents that it currently has in its possession, but each state agency may have additional documents responsive to the existing state agency document discovery agreements that have yet to be provided to the Attorney General's Office. Yesterday, the Attorney General's Office asked Meta to contact those state agencies directly about the status of their remaining document productions. Meta has reached out to those agencies to schedule a call about the status of their document productions, and is waiting to hear back.
- The **Delaware** Attorney General's Office has shared the District Court's order with the Delaware state agencies covered by this Court's September 6, 2024 agency discovery order (ECF 1117), advised Meta that two agencies are in the process of retaining outside counsel, and told Meta to await such contact from such soon-to-be-retained outside counsel. The Delaware Governor's Office separately reached out to schedule a call with Meta, and that call is now scheduled for Monday.

II. Administrative Issues that Are Disputed or Require Court Action

The Parties do not have any disputed administrative issues that they would like to bring to the Court's attention.

III. Ripe Disputes for Which Joint Letter-Briefs (“JLBs”) Have Already Been Filed or Will Be Filed Imminently

A. Defendants v. PI Bellwethers

1. Plaintiff Jessica Smith’s clawback of communications based upon the assertion of patient/therapist privilege and Defendants’ request for certain medical records from Plaintiff Jessica Smith (Supplemental Joint Letter Brief filed under seal on March 13, 2025) (ECF 1761)

B. Meta v. All Plaintiffs

1. Plaintiffs’ Request for Clarification re the Requirements Under the Protective Order for Showing Highly Confidential “Meta Platforms” Custodian Documents to Former Meta Employees in Deposition (Joint Letter Brief To Be Filed March 18, 2025)
2. Plaintiffs’ Notices of Intent to Take Depositions of Three Former Meta Employee Witnesses¹

C. Meta v. State AGs

1. Meta’s Amended 30(b)(6) Notice to Certain States Only Asserting COPPA Claims (or Transitioning to Such Status) (Joint Letter Brief To Be Filed March 17, 2025)
2. Meta’s Responses and Objections (“R&Os”) to State AGs’ RFP No. 102 (Joint Letter Brief To Be Filed March 18, 2025)

D. YouTube v. PI/SD Plaintiffs

1. Plaintiffs’ 30(b)(6) Notices (Joint Letter Brief To Be Filed March 18, 2025)

E. Meta v. Third Parties

1. Meta’s Subpoenas for Documents from Former Employees Bejar and Jayakumar (Joint Letter Briefs Filed March 14, 2025) (ECF 1764, 1765)

¹ The Parties had an initial conferral on this issue on Friday, March 14, and have not yet had an H.2 conference. This issue may or may not be ripe in advance of the DMC.

IV. Unripe Disputes

A. Defendants v. PI Bellwethers

1. Craig and McNeal – number and timing of depositions of third-party witnesses
2. Craig – court order related to prohibition on internet access
3. Mullen – deposition of witness located in Switzerland
4. S.K. – Plaintiff's production of documents from non-Defendant social media accounts
5. Defendants' production of bellwether-specific data
6. RFPs held in abeyance
7. Number and timing of depositions of third-party witnesses

B. Defendants v. SD Bellwethers

1. Bellwether School District RFP Set A
2. 30(b)(6) Notice [Chathams]
3. Disputes re Privilege Logs
4. Interrogatory No. 4 Deficiencies
5. Interrogatory No. 5 Deficiencies
6. Non-Custodial Sources
7. Non-Bellwether PFS Deficiencies
8. SD Plaintiffs' 30(b)(6) Deposition Notices to Defendants

C. Meta v. All Plaintiffs

1. Interrogatories relating to Plaintiff-specific affirmative defenses
2. Meta's R&Os to Plaintiffs' Second and Third Sets of ROGs
3. Meta's written interrogatory responses from Meta Related Actions
4. Meta v. PI/SD Plaintiffs
5. School District RFP No. 3 from Set A
6. Privilege disputes

D. Meta v. State AGs

1. Meta's Document Requests to the California Governor's Office of Business and Economic Development
2. State AGs' R&Os to Meta's Third Set of RFPs
3. State AGs' R&Os to Meta's First and Second Set of ROGs
4. State AGs' 30(b)(6) Deposition Notice to Meta
5. Meta's Amended 30(b)(6) Notice to States Asserting Both Consumer Protection and COPPA Claims²
6. Meta's R&Os to the State AGs' RFPs and ROGs related to financial data and information

E. Snap v. PI/SD Plaintiffs

1. Production schedule for Snap's substantial completion of custodial Snapchat communications
2. Scope of Plaintiffs' Rule 30(b)(6) notice regarding school district-related topics

F. TikTok v. PI/SD Plaintiffs

1. School District RFP No. 5
2. Plaintiffs' challenges to the TikTok Defendants' privilege claims
3. Interrogatories Sets 4 & 5
4. Apex depositions
5. Plaintiffs' request for work-related text messages stored on a company employee's personal cell phone
6. Counsel's questioning in and objections at company witness depositions
7. Plaintiffs' request for additional Zoom and other meeting recordings
8. Interrogatories Set 7

G. YouTube v. PI/SD Plaintiffs

1. RFP Nos. 16 and 18

² The State AGs contend this issue is ripe.

2. RFP Nos. 37 and 50
3. RFP 62, 69, 71-72, 76, and 79
4. Interrogatories Set 2 (No. 2)
5. RFP Sets 11 and 12
6. RFP Nos. 107-109
7. RFP Nos. 86-87
8. Non-Custodial Sources³
9. YouTube Amended Disclosures⁴

³ Plaintiffs contend this issue is ripe.

⁴ Plaintiffs contend this issue is ripe.

Respectfully submitted,

DATED: March 14, 2025

By: /s/ Lexi J. Hazam

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ATTESTATION

I, Lexi J. Hazam, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: March 14, 2025

By: /s/ Lexi J. Hazam
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